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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
REPLY IN SUPPORT OF MOTION FOR
ORDER TO SHOW CAUSE WHY OTTO
TRUCKING SHOULD NOT BE HELD IN
CONTEMPT OF THE PRELIMINARY
INJUNCTION ORDER (DKT. 426)**

Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal confidential information in portions of its Reply in Support of Motion for Order to Show Cause Why Otto Trucking Should Not be Held in Contempt of the Preliminary Injunction Order (Dkt. 426) (“Motion”). Specifically, Waymo requests an order granting leave to file under seal the portions of the document as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Motion	Highlighted Portions	Defendants and/or non-party Lior Ron (blue highlighting)

I. LEGAL STANDARD

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

II. UBER’S CONFIDENTIAL INFORMATION

Waymo seeks to seal portions of its Reply only because Defendants and/or non-party Lior Ron have designated the information confidential and/or highly confidential. Declaration of Felipe Corredor, ¶ 3. Waymo expects Defendants and/or non-party Lior Ron to file one or more declarations in accordance with the Local Rules. *Id.* ¶ 4.

III. CONCLUSION

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above listed documents accompany this Administrative Motion. For the foregoing reasons, Waymo respectfully requests that the Court grant Waymo’s administrative motion to file under seal.

DATED: July 31, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By /s/ Charles Verhoeven

Charles Verhoeven
Attorneys for WAYMO LLC